

**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
BUREAU OF AIR**

July 2005

Responsiveness Summary
for Public Questions and Comments on the Draft Federally Enforceable State Operating Permit for
Arrow Road Construction Company

Site Identification No.: 089020ABL
Application No.: 03110010

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INTRODUCTION

Arrow Road Construction Company submitted an application for an operating permit to the Illinois EPA to operate an asphalt plant at 33 W 760 Bolz Road in Carpentersville. After review of the application the Illinois EPA prepared a draft Federally Enforceable State Operating Permit (FESOP). A comment period was opened by the Illinois EPA to receive comments on the application and draft permit.

Upon review of comments received during the public comment period and final review of the application, the Illinois EPA has determined that the project meets the standards for issuance of a construction permit. Accordingly, on July 8, 2005, the Illinois Environmental Protection Agency (Illinois EPA) issued a FESOP to Arrow Road Construction Company to operate the asphalt plant.

COMMENT PERIOD AND PUBLIC HEARING

The Illinois EPA Bureau of Air evaluates applications and issues permits for sources of emissions to the atmosphere. An air permit application must appropriately address compliance with applicable air pollution control laws and regulations before a permit can be issued. Following its initial technical review of Arrow Road Construction Company's application, the Illinois EPA Bureau of Air made a preliminary determination that the project met the standards for issuance of a permit and prepared a draft permit for public review and comment.

The public comment period began on March 28, 2005, with the publication of a notice in the Northwest Herald and Carpentersville Daily Herald. Additional notices were published in these two papers on April 4 and 11, 2005. A public hearing was held on May 17, 2005, at the Dundee Crown High School auditorium, 1500 Kings Road in Carpentersville to receive oral comments and answer questions regarding the application and draft air permit. The comment period closed on June 16, 2005.

AVAILABILITY OF DOCUMENTS

Copies of the final Permit and this Responsiveness Summary are available through the following means:

1. By viewing the documents at one of the following repositories:

Illinois EPA – Des Plaines Regional Office
9511 West Harrison
Des Plaines, IL
847/294-4000

Illinois EPA
1021 North Grand Avenue, East
Springfield, IL 62794
217/782-7027

2. By contacting the Illinois EPA by telephone, facsimile or electronic mail:

Illinois EPA
Bradley Frost, Office of Community Relations
217-782-7027 Desk line
217-782-9143 TDD
217-524-5023 Facsimile
brad.frost@epa.state.il.us

3. By accessing the World Wide Web at www.epa.state.il.us/public-notices/general-notices.html or www.epa.gov/region5/air/permits/ilonline.htm (for the second address look under All Permit Records, FESOP, New).

To obtain a printed copy of the documents by mail and free of charge, please contact me at the contact information listed in #2 above.

QUESTIONS AND COMMENTS

1. **The emissions from this facility will impact the nearby school. School children are going to breathe this air all day long.**

The asphalt plant is a small source of air emissions that will not significantly impact ambient air quality and will not cause a violation of National Ambient Air Quality Standards (NAAQS). The NAAQS are standards established by the federal government to be protective of human health and the environment, particularly sensitive populations such as children and the elderly.

2. **There is a lot of dust and we have to constantly clean our windows. And people that live along Bolz Road cannot even open their windows in the summertime.**

The permit contains conditions to minimize the fugitive dust generated by the facility, such as Conditions 8(a) – 8(c), which require that the company pave or spray roads to minimize dust generated. However, if the facility becomes a source of nuisance problems, such as dust, residents should contact the Illinois EPA regional office in Des Plaines, 847/294-4000, to submit a complaint. In this way the Illinois EPA will know to send an inspector to the site to try to determine the source of the fugitive emissions. As mentioned in other comments, there are several other sources in the area that could be a source of fugitive dust emissions.

3. **We are very disappointed in our county government and Callahan to allow an asphalt plant so close to houses and a school. The facility will be a visual nuisance I don't think it should have been allowed to be built there to begin with. It should be placed in an industrial area where other buildings and such coexist.**

The Illinois EPA does not have authority to determine local zoning or land use planning. This is the authority of local elected officials.

4. **I have heard Callahan working on site as early as 5:00 am. I believe they weren't supposed to start until 7:00 am. This is a violation of the county ordinance.**

The Illinois EPA's permit does not limit hours of operation. If the company has an agreement with the local county board or city, that entity would be responsible for enforcing the agreement.

5. **We were promised monitors along Bolz Road. We also were told by Mike McCoy, Chairman of the County Board, that we would get diesel emission monitors. We still have not gotten those.**

The Illinois EPA has not at any time promised to install air monitors on Bolz Road. The air monitoring that the Illinois EPA performs is to monitor regional air quality. The Illinois EPA does not monitor to determine emissions from a single industry, as this would not be an effective gauge of a single facility's emissions due to other local sources of emissions, such as other facilities and mobile sources. The Illinois EPA instead relies on the testing that the facility must perform to determine that its emissions will be within permitted levels.

6. **Under the construction permit was Callahan allowed to produce at full capacity?**

Yes, production levels under the construction permit are the same as the levels allowed under the operating permit.

7. **Every time they fired up that plant in the morning, you smelled it.**

As with nuisance dust, if residents are experiencing nuisance odors they should contact the Illinois EPA's regional field office in Des Plaines, 847-294-4000, to make a complaint.

8. **The asphalt plant is a polluter. The gravel pit, the mining operation is in violation of their ordinance as far as sound, operation time, and particulate matter leaving the site. The Illinois EPA is not doing anything about these problems.**

While the asphalt plant is a source of air emissions, it is not a "polluter" in the sense of whether it is in violation of the state's air emission regulations or permitted conditions. As stated in response to

other comments in this document, if there are fugitive dust emissions, residents should call the Illinois EPA's regional office in Des Plaines. Neither the permit nor the air regulations restrict operating hours at the facility and while the Illinois EPA no longer has an inspector for noise pollution, the noise pollution regulations may be directly enforced by anyone.

9. Does the permit allow Arrow Road to increase production levels above those allowed by the construction permit for Callahan?

The production limits in the operating permit are the same as those in the construction permit.

10. The draft operating permit includes three storage tanks and three hot mix silos that were not in the construction permit. Is Arrow Road increasing equipment and emissions?

The facility is not adding three storage tanks and three hot mix silos. This was equipment that Callahan already had on site but that was not required to be listed in the construction permit. Since the issuance of the construction permit, USEPA has decided that these types of emissions sources should be listed in permits, so they have been included in the operating permit.

The permit does not allow an increase in production or actual emissions from the facility. The permit reflects an increase in potential emissions because the emissions of the three tanks and three silos are now listed in the operating permit.

12. Has Callahan already received their operating permit?

The Illinois EPA issued the operating permit to Arrow Road on July 8, 2005, after closure of the comment period and a review of the comments received.

13. Does the Illinois EPA know how long Arrow Road will operate at this location?

No. However, the facility will need to renew its operating permit every five years.

14. Is there enough gravel at Arrow Road to produce five years' worth of asphalt?

The facility does not produce aggregate on site. The company brings aggregate to the facility from other sites.

- 15. There will be twice as much truck traffic at this facility because Arrow Road has to truck in the aggregate as well as truck out the asphalt. We are concerned about the emissions from the diesel trucks.**

The Illinois EPA does not regulate truck traffic or mobile source emissions in the permit. Diesel truck emissions are regulated through engine performance standards when the engines are manufactured. The USEPA is also implementing new sulfur standards for diesel fuel, which will drastically reduce emissions of sulfur dioxide and particulate matter from diesel fuel.

- 16. Trucks coming into the facility stage off the road and tear up the side of the road and cause a concentration of diesel emission fumes.**

The Illinois EPA does not enforce traffic laws. Local police would be able to answer whether trucks staging off the road while they wait to come into the facility is illegal or whether these trucks exceed maximum weight limits for the roadway.

As described in the answer above, the federal government has set new standards for diesel fuel emissions, which will go into effect the summer of 2006, which will dramatically reduce the amount of emissions that come from diesel burning engines.

FOR ADDITIONAL INFORMATION

Questions about the public comment period and permit decision should be directed to:

Bradley Frost, Community Relations Coordinator
Illinois Environmental Protection Agency
Office of Community Relations
1021 North Grand Avenue, East
P.O. Box 19506
Springfield, Illinois 62794-9506
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